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# D.C. CHILD AND FAMILY SERVICES

## Key Issues Affecting the Management of Its Foster Care Cases

Statement of Cornelia M. Ashby, Director  
Education, Workforce, and Income Security Issues



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Highlights of [GAO-03-758T](#), testimony before the Committee on Government Reform, House of Representatives

### Why GAO Did This Study

The District of Columbia (D.C.) Child and Family Services Agency (CFSA) is responsible for protecting children at risk of abuse and neglect and ensuring that critical services are provided for them and their families. GAO was asked to discuss the extent to which CFSA has (1) met the requirements of the Adoption and Safe Families Act (ASFA) of 1997 and other selected performance criteria, (2) adopted and implemented child protection and foster care placement policies, and (3) enhanced its working relationship with the D.C. Family Court.

To address these questions, GAO analyzed data in the District's automated child welfare information system, known as FACES; reviewed laws, regulations, and reports; examined case files; and interviewed officials.

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To view the full testimony, click on the link above. For more information, contact Cornelia M. Ashby, (202) 512-8403, [ashbyc@gao.gov](mailto:ashbyc@gao.gov).

## D.C. CHILD AND FAMILY SERVICES

# Key Issues Affecting Management of Its Foster Care Cases

### What GAO Found

CFSA's performance relative to three sets of measures—nine ASFA requirements, eight selected performance criteria, and six of the agency's foster care policies—has been mixed. The agency took actions to implement six of the nine ASFA requirements related to the safety and well-being of foster children, and met or exceeded four of the eight selected foster care performance criteria, but its plans do not address all unmet requirements and criteria. CFSA has established many foster care policies, but caseworkers did not consistently implement the six GAO examined. In addition, FACES lacked data on four of these six policies for at least 70 percent of its active foster care cases. The following table summarizes five selected foster care policies for which data were available and the percentage of cases for which the data indicated the policy was implemented.

**Implementation of Selected CFSA Foster Care Policies, as Documented in FACES**

CFSA policy	Foster care cases for which the policy was implemented <sup>a, b</sup>
Initiate face-to-face investigation of alleged child abuse or neglect within 24 hours of receiving an allegation on CFSA's child abuse hotline.	26%
Complete a safety assessment within 24 hours of face-to-face contact with the child.	13%
Complete a risk assessment within 30 days of receiving an allegation on the hotline.	73%
Complete an initial case plan within 30 days of a child's entry into foster care.	9%
Arrange needed services for foster care children or their families.	83%

Source: FACES and GAO analysis.

<sup>a</sup>With the exception of the policy to arrange needed services, the analysis is based on 943 foster care cases that were at least 6 months old, as of Nov. 30, 2002. These cases were initiated after FACES came on-line in Oct. 1999. The analysis of the policy to arrange for needed services is based on 1,837 foster care cases and includes cases that pre-dated FACES but for which services were provided after FACES came on-line. Data show the percentage of cases for which caseworkers arranged at least one service.

<sup>b</sup>CFSA counted cases that had missing data as instances of caseworker noncompliance with the applicable policy.

CFSA has enhanced its working relationship with the D.C. Family Court, but several factors hindered this relationship. For example, CFSA's top management and Family Court judges talk frequently about foster care case issues. However, differing opinions among CFSA caseworkers and judges about their responsibilities have hindered the relationships. CFSA officials and Family Court judges have been working together to address these hindrances.

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Mr. Chairman and Members of the Committee:

I am pleased to be here today to discuss preliminary findings from our study of the District of Columbia's Child and Family Services Agency (CFSA) you requested. My testimony will focus on the extent to which CFSA has (1) taken actions to address the requirements of the Adoption and Safe Families Act (ASFA) of 1997 and met selected performance criteria, (2) adopted and implemented child protection and foster care placement policies that are comparable to those generally accepted in the child welfare community, and (3) enhanced its working relationship with the D.C. Family Court.

My comments today are based primarily on our analysis of the information in the District's automated child welfare information system, known as FACES, which CFSA is to use to manage child welfare cases and report child abuse and neglect, foster care, and adoption information to the U.S. Department of Health and Human Services (HHS). We selected three sets of measures to assess CFSA's performance. We assessed CFSA's progress in implementing nine ASFA requirements that were related to the safety and well-being of children in foster care, the extent to which CFSA met or exceeded eight selected performance criteria established during its probationary period, and the extent to which caseworkers implemented six foster care policies related to their day-to-day responsibilities. We included HHS's evaluation of how CFSA implemented ASFA requirements in our assessment of the agency's performance. We analyzed foster care cases in FACES that were at least 6 months old as of November 2002 and verified the accuracy of its data. However, CFSA had not entered into FACES detailed information on the data elements we needed for our analysis with respect to about two-thirds of the District's active foster care cases—mostly cases that originated prior to FACES going on-line in October 1999. Consequently, we also reviewed paper case files for children with different beginning dates in the foster care system to supplement FACES information for some cases. We also interviewed District officials; CFSA managers, judges, and child welfare experts; and we analyzed federal and District laws and regulations, related court documents, and child welfare policies. Our final report will be issued later this month. We conducted our work between September 2002 and May 2003 in accordance with generally accepted government auditing standards.

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In summary, CFSA has taken actions to implement various ASFA requirements and met several selected foster care performance criteria,<sup>1</sup> established child protection and foster care placement policies and procedures, and enhanced its working relationship with the D.C. Family Court; however, much remains to be done. CFSA took actions to implement two-thirds of the ASFA requirements and met or exceeded half of the selected foster care performance criteria we used and developed written plans to address two of the three ASFA requirements not fully met and three of the four unmet foster care performance criteria. In addition, CFSA has adopted child protection and foster care placement policies and procedures that are comparable to most, but not all, of those recommended by organizations that develop standards applicable to child welfare programs. However, CFSA has not adopted some key policies and procedures for ensuring the safety and permanent placement of children, and caseworkers have not consistently implemented or documented some of the policies and procedures that have been adopted. While timeframes for implementing certain policies, such as initiating investigations and completing safety assessments have improved since 2000, caseworkers still take considerably longer than the prescribed time limits to complete these critical tasks, thereby increasing the potential risks posed to the safety and well-being of the District's children. In addition, CFSA has developed an automated child welfare data system to help manage its caseload, among other initiatives to help improve its performance. However, detailed information for the data elements related to four of the six policies reviewed had not been entered into the system for at least 70 percent of its active foster care cases. Further, CFSA has improved its working relationship with the Family Court through improved communication and support from top CFSA managers and Family Court judges; however, both CFSA and the Family Court still need to overcome barriers that continue to hinder this relationship.

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## Background

While CFSA is responsible for protecting children at risk of abuse and neglect, many children in CFSA's care languished for extended periods of time due to managerial shortcomings and long-standing organizational divisiveness in the District of Columbia. As a result of these deficiencies, the U.S. District Court for the District of Columbia issued a remedial order

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<sup>1</sup>These performance criteria were among those included in the performance standards that CFSA had to meet in order to end the probationary period following the general receivership. We selected those performance criteria that in our judgment most directly relate to the safety and permanent placement of children.

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in 1991 to improve the performance of the agency. Under a modified final order established by the court in 1993, CFSA was directed to comply with many requirements. In 1995, lacking sufficient evidence of program improvement, the agency was removed from the District's Department of Human Services and placed in receivership.<sup>2</sup> Among its efforts to improve agency performance, CFSA established an automated system, FACES, to manage its caseload. The District Court issued a consent order in 2000 establishing a process by which the agency's receivership could be terminated. The order also established a probationary period, which would commence upon termination of the receivership, and identified performance standards CFSA had to meet in order to end the probationary period. The court-appointed monitor, the Center for the Study of Social Policy, was to assess CFSA's performance and had the discretion to modify the performance standards. In June 2001, the court removed CFSA from receivership. In September 2002, the court-appointed monitor reported that a 7-year old child was abused by two children in a group home licensed by CFSA. This incident, according to the monitor, together with the history of inadequate care and attention given this child by CFSA, indicated that its operations and policies, especially those regarding foster care cases, may still need improvement.

CFSA operates in a complex child welfare system.<sup>3</sup> Several federal laws, local laws, and regulations established goals and processes under which CFSA must operate. ASFA, with one of its goals to place children in permanent homes in a timelier manner, placed new responsibilities on all child welfare agencies nationwide. ASFA introduced new time periods for moving children toward permanent, stable care arrangements and established penalties for noncompliance. For example, ASFA requires child welfare agencies to hold a permanency planning hearing—during which the court determines the future plans for a child, such as whether the state should continue to pursue reunification with the child's family or some other permanency goal—not later than 12 months after the child enters foster care. The District of Columbia Family Court Act of 2001 (P.L. 107-114) established the District's Family Court and placed several requirements on the District's Mayor and various District agencies,

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<sup>2</sup>The receivership was an arrangement in which the court appointed a person to temporarily manage the agency with broad authority to ensure full compliance with the court order in an expeditious manner.

<sup>3</sup>We issued several reports that addressed CFSA operations and program plans. For more information see related GAO products.

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including CFSA and the Office of Corporation Counsel (OCC).<sup>4</sup> The District of Columbia Family Court Act of 2001 requires the Mayor, in consultation with the Chief Judge of the Superior Court, to ensure that CFSA and other D.C. government offices coordinate the provision of social services and other related services to individuals served by the Family Court.

CFSA relies on services provided by other District government agencies. For example, both the Fire Department and the Health Department inspect facilities where children are placed, and D.C. Public Schools prepare individual education plans for some children in care. CFSA also works with agencies in Maryland, Virginia, and other states to arrange for placements of District children and also works with private agencies to place children in foster and adoptive homes. In addition, CFSA is responsible for licensing and monitoring organizations with which it contracts, including group homes that house foster care children.

The management of foster care cases involves several critical responsibilities required by CFSA policy. Typically, these cases begin with an allegation of abuse or neglect reported to CFSA's child abuse hot line. CFSA staff are required to investigate the allegations through direct contact with the reported victim. If required, the child may be removed from his or her home, necessitating various court proceedings handled by the District's Family Court. CFSA caseworkers are responsible for managing foster care cases by developing case plans; visiting the children; participating in administrative review hearings, involving CFSA officials, children, parents, attorneys, and other officials; attending court hearings, and working with other District government agencies. CFSA case workers are also responsible for documenting the steps taken and decisions made related to a child's safety, well being, and proper foster care placement, as well as those related to developing the most appropriate goal for permanency. Depending on their circumstances, children leave foster care and achieve permanency through reunification with their birth or legal parents, adoption, legal guardianship with a relative, or independence.<sup>5</sup> As

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<sup>4</sup>Among other responsibilities, OCC provides legal support to CFSA in its handling of foster care cases.

<sup>5</sup>Independent living arrangements may be attained once a child, who has not been reunified with his family or adopted, reaches the age of 18 or, in some jurisdictions, 21 and is no longer eligible to receive federal reimbursement for foster care expenditures.

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of September 2002, a child's length of stay in the District's foster care program averaged 2.8 years.

HHS is responsible for setting standards and monitoring the nation's child welfare programs. In fiscal year 2001, about \$6.2 billion in federal funds were appropriated to HHS for foster care and related child welfare services. HHS's monitoring efforts include periodic reviews of the operations, known as Child and Family Services Reviews,<sup>6</sup> and of the automated systems, known as Statewide Automated Child Welfare Information System (SACWIS) Reviews, in the states and the District of Columbia. HHS last reviewed CFSA's child welfare information system in 2000 and its overall program in 2001.

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## CFSA Undertook Actions to Implement Most ASFA Requirements Reviewed and Met Half of the Selected Performance Criteria for Child Safety and Well-Being

CFSA undertook actions to implement six of the nine ASFA requirements we reviewed and met or exceeded four of the eight performance criteria we included in our study, but CFSA's plans to improve its performance do not include all unmet ASFA requirements or selected performance criteria. Table 1 summarizes CFSA's progress in implementing the nine ASFA requirements that we reviewed.

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<sup>6</sup>Child and Family Services Reviews, conducted by HHS, cover a range of child and family service programs funded by the federal government, including child protective services, foster care, adoption, independent living, and family support and preservation services. The 2001 review evaluated seven specific safety, permanency, and well-being outcomes for services delivered to children and families served by CFSA.

**Table 1: CFSA’s Progress in Implementing Nine ASFA Requirements**

<b>ASFA requirements CFSA has implemented</b>	<b>ASFA requirements CFSA has not fully implemented</b>
1. Include the safety of the child in state case planning and in a case review system.	1. Initiate or join proceedings to terminate parental rights for certain children in foster care—such as those who have been in foster care for 15 of the most recent 22 months of care.
2. Comply with requirements for criminal background clearances and have procedures for criminal record checks.	2. Provide participants a notice of reviews and hearings and an opportunity to be heard.
3. Develop a case plan documenting steps taken to provide permanent living arrangements for a child.	3. Conduct mandatory permanency hearings every 12 months for a child in foster care.
4. Develop plans for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.	
5. Provide for health insurance coverage for children with special needs in state plans for foster care and adoption assistance.	
6. Incorporate standards to ensure quality services for children in foster care in state plans.	

Source: ASFA and HHS’s CSFR and GAO analysis.

Note: Our assessment of CFSA’s progress in implementing three requirements—include the safety of the child in case planning, develop a case plan documenting steps taken to provide permanent living arrangements for a child, and provide for health insurance coverage for children with special needs—is based on data and information provided to us. Our assessment of CFSA’s progress in implementing the remaining ASFA requirements is based on HHS’s review of CFSA.

The HHS review of CFSA found that the agency did not meet three requirements. CFSA did not consistently petition the Family Court to terminate parental rights when returning the child to his or her family had been deemed inappropriate and the child had been in foster care for 15 of the last 22 months. Based on its review of 50 foster care cases, HHS reported that 54 percent of the children who were in care longer than 15 months did not have hearings initiated for the termination of parental rights, and reasons for not initiating such hearings were not documented in the case plan or court order. HHS also found that not all cases had hearings to review a child’s permanency goal within the timeframe prescribed by ASFA. In addition, foster parents, relative caretakers, and pre-adoptive parents were not consistently notified of reviews or hearings held on behalf of the foster child. HHS found that there was a lack of

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communication in notifying caregivers and prospective caregivers of the time and place of a hearing, if such notification took place at all.

We also analyzed automated data from FACES related to eight foster care performance criteria and found that CFSA met or exceeded four of them. For example, one of the criteria requires 60 percent of children in foster care to be placed with one or more of their siblings; we found that as of November 30, 2002, 63 percent of children were placed with one or more siblings. The areas in which CFSA's performance fell short included criteria related to (1) caseworker visitation with children in foster care, (2) placement of children in foster homes with valid licenses, (3) progress toward permanency for children in foster care, and (4) parental visits with children in foster care who had a goal of returning home. For example, none of the 144 children placed in foster care during the 2-month period prior to November 30, 2002, received required weekly visits by a CFSA caseworker. Table 2 summarizes our analysis of the selected foster care performance criteria.

**Table 2: Analysis of Selected Foster Care Performance Criteria**

Foster care performance criteria	Met	Analysis
1. Current case plans for foster care cases. Forty-five percent of foster care cases have current case plans.	Met	As of September 30, 2002, 46 percent of foster care cases had current case plans.
2. Visitation between children in foster care and their parents Thirty-five percent of cases in which children have a permanency goal of return home have parental visits at least every 2 weeks.	Not met	As of November 30, 2002, 1 percent of children with a return home goal had parental visits at least every 2 weeks.
3. Social worker visitation with children in foster care Twenty-five percent of children in foster care have weekly visits with social workers in their first 8 weeks of care; 35 percent of all children in foster care have at least monthly visits with a social worker.	Not met	As of November 30, 2002, no children had weekly visits and at least 98 percent of children did not have monthly visits with a caseworker. <sup>a</sup>
4. Appropriate legal status for children in foster care No child in emergency care for more than 90 days.	Met	As of November 30, 2002, no children in emergency care more than 90 days.
5. Current and valid foster home licenses Seventy-five percent of children are placed in foster home with valid licenses.	Not met	As of November 30, 2002, 47 percent of children were in foster homes with valid licenses.
6. Progress toward permanency No more than 10 percent of children in foster care have a permanency goal of return home for more than 18 months.	Not met	As of November 30, 2002, 30 percent of children had permanency goal of return home more than 18 months.
7. Foster care placement with siblings Sixty percent of children in foster care are placed with one or more of their siblings.	Met	As of November 30, 2002, 63 percent of children were placed with one or more siblings.
8. Placement stability No more than 25 percent of children in foster care as of May 31, 2002, have had three or more placements.	Met	As of November 30, 2002, 21 percent of children had three or more placements.

Source: GAO analysis.

<sup>a</sup>For 2 percent of the children, caseworker visits equaled or exceeded the number of months in placement. However, CFSA's data for the performance measure to this criterion do not allow for the determination of whether caseworkers visited children each month they were in foster care.

CFSA's Program Improvement Plan, a plan required by HHS to address those areas determined not met by HHS, identifies how it will address two of the unmet ASFA requirements—(1) to initiate or join proceedings to terminate parental rights (TPR) of certain children in foster care and (2) to ensure that children in foster care have a permanency hearing every 12 months. For example, CFSA has outlined steps to improve its filings of TPR petitions with the Family Court. To help facilitate this process, CFSA hired additional attorneys to expedite the TPR proceedings. The new attorneys have been trained in ASFA requirements and in the process for

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referring these cases to the Family Court. CFSA is also developing a methodology for identifying and prioritizing cases requiring TPR petitions. While CFSA's updated Program Improvement Plan states its intent to provide notification of hearings to all participants, this plan does not make it clear whether all applicable reviews and hearings will be included.

Another CFSA plan—the Interim Implementation Plan—includes measures that were developed to show the agency's plans for meeting the requirements of the modified final order issued by the U.S. District Court for the District of Columbia.<sup>7</sup> This plan includes actions to address three of the four performance criteria CFSA did not meet—visits between children in foster care and their parents, social worker visitation with children in foster care, and placement of children in foster homes with current and valid licenses. The plan states that, for new contracts, CFSA will require its contactors to identify community sites for parental visits to help facilitate visits between children in foster care and their parents. The plan also indicates that CFSA will concentrate on the recruitment and retention of caseworkers. According to CFSA officials, caseworkers would have more time for quality casework, including visitation with children, parents, and caregivers, once they hire more caseworkers. Additionally, the plan established a goal to have 398 unlicensed foster homes in Maryland licensed by December 31, 2002. However, CFSA does not have written plans that address the performance criterion to reduce the number of children in foster care who, for 18 months or more, have had a permanency goal to return home. Without complete plans for improving performance for all measures, CFSA's ability to comply with the ASFA requirements and meet the selected performance criteria may be difficult. Furthermore, unless these requirements and criteria are met, the time a child spends in foster care may be prolonged, or the best decisions regarding a child's future well-being may not be reached.

CFSA officials cited several factors that hindered their ability to fully meet the ASFA requirements and the selected performance criteria, including court-imposed requirements, staffing shortages, and high caseloads. For example, program managers and supervisors said that the new court-imposed mediation process intended to address family issues without formal court hearings places considerable demands on caseworkers' time.

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<sup>7</sup>In April 2003, the court-appointed monitor submitted a final implementation plan containing additional performance measures to the U.S. District Court for the District of Columbia for its approval. Once approved, this plan will establish goals CFSA must meet by 2006.

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The time spent in court for mediation proceedings, which can be as much as 1 day, reduces the time available for caseworkers to respond to other case management duties, such as visiting with children in foster care. Furthermore, managers and supervisors reported that staffing shortages have contributed to delays in performing critical case management activities, such as identifying cases for which attorneys need to file TPR petitions. However, staffing shortages are not a unique problem to CFSA. We recently reported that caseworkers in other states said that staffing shortages and high caseloads had detrimental effects on their abilities to make well-supported and timely decisions regarding children's safety.<sup>8</sup> We also reported that as a result of these shortages, caseworkers have less time to establish relationships with children and their families, conduct frequent and meaningful home visits, and make thoughtful and well-supported decisions regarding safe and stable permanent placements.

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## CFSA Has Established Many Foster Care Policies but Lacks Others, and the Extent of Implementation and Documentation Varies

CSFA has established many foster care policies, but caseworkers did not consistently implement the six we selected. These policies covered the range of activities involved in a foster care case, but did not duplicate those examined in our review of the AFSA requirements or the selected foster care performance criteria. In addition, CFSA's automated system lacked data on policy implementation for at least 70 percent of its active foster care cases. Without information on all cases, caseworkers do not have a readily available summary of the child's history needed to make decisions about a child's care, and managers do not have information needed to assess and improve program operations.

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<sup>8</sup>U.S. General Accounting Office, *Child Welfare: HHS Could Play a Greater Role in Helping Child Welfare Agencies Recruit and Retain Staff*, GAO-03-357 (Washington, D.C.: Mar. 31, 2003).

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## CSFA Has Established Many Foster Care Policies, but Caseworkers Did Not Consistently Implement Those We Selected

While we previously reported in 2000<sup>9</sup> that CFSA lacked some important child protection and foster care placement policies, CFSA has now established many such policies and most are comparable to those recommended by organizations that develop standards applicable to child welfare programs. For example, CFSA has policies for investigating allegations of child abuse, developing case plans, and establishing permanency goals for foster children. In addition, one policy is more rigorous than suggested standards. Specifically, CFSA's policy requires an initial face-to-face meeting with children within 24 hours of reported abuse or neglect, while the suggested standard is 24 to 48 hours or longer, depending on the level of risk to the child's safety and well-being. However, CFSA does not have some recommended policies, namely those addressing (1) written time frames for arranging needed services for children and families (e.g., tutoring for children and drug treatment for family members); (2) limits on the number of cases assigned to a caseworker, based on case complexity and worker experience; and (3) procedures for providing advance notice to each person involved in a case about the benefits and risks of services planned for a child and alternatives to those services. CFSA managers said that the agency had not established these policies because agency executives gave priority to complying with court-ordered requirements.

CFSA did not consistently implement the policies we examined. We selected six policies that covered the range of activities involved in a foster care case, but did not duplicate those examined in our review of the AFSA requirements or the selected foster care performance criteria. CFSA could not provide automated data regarding the implementation of one policy requiring administrative review hearings every 6 months.<sup>10</sup> As for the remaining five policies, data in FACES indicate that caseworkers' implementation of them varied considerably. Table 3 summarizes these five policies and the percentage of cases for which the data indicated the policy was implemented.

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<sup>9</sup>U.S. General Accounting Office, *District of Columbia Child Welfare: Long-Term Challenges in Ensuring Children's Well-Being*, GAO-01-191 (Washington, D.C.: Dec. 29, 2000) and *Foster Care: Status of the District of Columbia's Child Welfare System Reform Efforts*, GAO/T-HEHS-00-109 (Washington, D.C.: May 5, 2000).

<sup>10</sup>Administrative review hearings are held to make decisions about a child's permanent placement. They generally involve foster care children, family members, CFSA caseworkers, attorneys, and others with a role in the future well-being of the child.

**Table 3: Implementation of Selected CFSA Foster Care Policies as Documented in FACES**

Policy	Percent of foster care cases for which the policy was implemented <sup>a, b</sup>
Initiate face-to-face investigation of alleged child abuse or neglect within 24 hours of receiving an allegation on CFSA's child abuse hotline.	26
Complete a safety assessment within 24 hours of face-to-face contact with the child.	13
Complete a risk assessment within 30 days of receiving an allegation on the hotline.	73
Complete an initial case plan within 30 days of a child's entry into foster care.	9
Arrange needed services for foster care children or their families.	83

Source: FACES data and GAO analysis.

<sup>a</sup>With the exception of the policy to arrange needed services, the analysis is based on 943 foster care cases that were at least 6 months old, as of November 30, 2002. These cases were initiated after FACES came on-line in October 1999. The analysis of the policy to arrange for needed services is based on 1,837 foster care cases and includes cases that pre-dated FACES but for which services were provided after FACES came on-line. Data show the percentage of cases for which caseworkers arranged at least one service.

<sup>b</sup>CFSA counted cases that had missing data as instances of caseworker noncompliance with the applicable policy.

The policies related to initiating face-to-face investigations and completing safety assessments are particularly critical to ensuring children's safety. CFSA's policy requires caseworkers to initiate an investigation of alleged child maltreatment within 24 hours of the call to CFSA's hot line through face-to-face contact with the child. Also, caseworkers are required to complete a safety assessment within 24 hours of the face-to-face contact with the child. While it took CFSA caseworkers considerably longer than the time specified in the policy to take these actions in some cases, CFSA's performance has improved. CFSA has reduced the average time it takes to make contacts and complete the assessments. In 2000, it took caseworkers an average of 18 days to initiate a face-to-face investigation, whereas in 2002 the average was 2 days. Similarly, caseworkers took an average of 30 days to complete safety assessments in 2000, whereas the average time declined to 6 days in 2002. Although there were cases that took much longer than the 24-hour limits, there were fewer in 2002 than in 2000. CFSA caseworkers took 5 or more days to initiate a face-to-face investigation for 61 cases in 2000, and for 16 cases in 2002. Table 4 summarizes the number of cases for which caseworkers took 5 or more days to initiate investigations and complete safety assessments from 2000 through 2002.

**Table 4: Number of Cases Taking 5 or More Days to Implement Policy (2000-2002)**

Policy	Fiscal Year			Total
	2000	2001	2002	
Initiate face-to-face investigation of alleged child abuse or neglect within 24 hours of receiving an allegation.	61	66	16	143
Complete a safety assessment within 24 hours of face-to-face contact with child.	101	122	50	273

Source: FACES data and GAO analysis.

We also reviewed case files and examined related data from FACES for 30 foster care cases to assess compliance with policies requiring timely case planning, periodic administrative review hearings, and arrangements for needed services. The case files we reviewed were often voluminous, inconsistently organized, and contained information that was not always traceable to data entered in FACES. Our review found that case plans were not routinely completed within 30 days, as required by CFSA policy. The FACES data provided subsequent to our case file review supported this assessment.

We also found that for almost half the cases we examined administrative review hearings, which are held to ensure that key stakeholders are involved in decisions about a child's permanent placement, were rescheduled, resulting in their being held less frequently than required by CFSA policy. CFSA policy requires that these hearings be held every 6 months, and FACES automatically schedules them to occur 6 months after the most recent hearing. However, CFSA officials are unable to track how frequently they are rescheduled or the length of time between hearings because the system overrides the dates of prior hearings. Long delays between administrative review hearings could mean delays in getting children into permanent placement. As for arranging needed services, we could not determine from case files or FACES whether services recommended by caseworkers were approved by supervisors or if all needed services were provided. The FACES data indicate that at least one service was provided for 83 percent of the cases, but do not include a complete record of all services caseworkers determine to be needed, nor do they indicate whether the services were provided on a timely basis.

Officials said that several factors affected the implementation of some of the policies we reviewed. Caseworkers' supervisors and managers explained that, generally, the policies were not always implemented because of limited staff and competing demands, and the policies were not documented because some caseworkers did not find FACES to be user

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friendly. Agency officials explained that, in part, data on the implementation of the initial investigations and safety assessment reflected a change in who was responsible for the initial investigation of child abuse cases. Until October 2001, the District's Metropolitan Police Department had this responsibility, and data on initial investigations were not entered into FACES. CFSA now has responsibility for both child abuse and neglect investigations. Further, program managers and supervisors said that several factors contributed to the time frames required to initiate face-to-face investigations, including difficulty in finding the child's correct home address, contacting the child if the family tries to hide the child from investigators, and even obtaining vehicles to get to the location. Regarding administrative review hearings, the records indicate that they were rescheduled for a variety of reasons, such as the caseworker needing to appear at a hearing for another case or the attorney not being able to attend the hearing. Managers also said that the data on service delivery was not always entered into FACES because caseworkers sometimes arranged services by telephone and did not enter the data into FACES.

CFSA officials said they recently made changes to help improve the implementation of some of the policies we reviewed. They said CFSA has focused on reducing the number of cases for which a risk assessment had not been completed and has reduced the number of these investigations open more than 30 days from 807 in May 2001 to 263 in May 2002. CFSA officials also said that they anticipate a reduction in the number of administrative review hearings that are rescheduled. They said the responsibility for notifying administrative review hearing participants about a scheduled hearing was transferred from caseworkers to staff in CFSA's administrative review unit, and they intend to provide notification well in advance of the hearings. Additionally, another official said that CFSA has begun testing a process to ensure that all needed services are provided within 45 days.

Such improvements are needed because without consistently implementing policies for timely investigations and safety and risk assessments, a child may be subject to continued abuse and neglect. Delays in case plan preparation and in holding administrative review hearings delay efforts to place children in permanent homes or reunite them with their families. Further, without knowing whether children or families received needed services, CFSA cannot determine whether steps have been taken to resolve problems or improve conditions for children in its care, which also delays moving children toward their permanency goals.

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## CFSA Has Established Policies and Goals for Group Homes

In addition to its policies for managing cases, CFSA has policies for licensing and monitoring group homes, plans for training staff in group homes, and a goal to reduce the number of young children in group homes. CFSA's policies for group homes are based primarily on District regulations that went into effect July 1, 2002. For example, the regulations prohibited CFSA from placing children in an unlicensed group home as of January 1, 2003. According to CFSA officials, as of March 2003, all CFSA group homes were licensed, except one, and CFSA was in the process of removing children from that home. CFSA plans to monitor group homes by assessing their compliance with contractual provisions and licensing requirements. CFSA also plans to provide training to group home staff to make it clear that, as District regulations require, any staff member who observes or receives information indicating that a child in the group home has been abused must report it. Further, CFSA has a goal to reduce the number of children under 13 who are placed in group homes. According to agency officials, CFSA has reduced the number of children under 13 in group homes from 128 in August 2002 to 70 as of February 2003 and has plans to reduce that number even further by requiring providers of group home care to link with agencies that seek foster care and adoptive families.

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## CFSA's Automated System Lacked Data on Many Foster Care Cases

In our efforts to assess CFSA's implementation of the six selected foster care policies related to the safety and well-being of children as shown in table 2, we determined that FACES lacked data on many active foster care cases. In December 2000, we reported that FACES lacked complete case information and caseworkers had not fully used it in conducting their daily casework.<sup>11</sup> During our most recent review, we determined that FACES lacked data on four of six foster care policies for at least 70 percent of its active foster care cases. Of the 2,510 foster care cases at least 6 months old as of November 30, 2002, data were not available for 1,763 of them. CFSA officials explained that all of these cases predated FACES, and the previous system was used primarily to capture information for accounting and payroll purposes, not for case management. Top agency managers said that CFSA does not plan to make it an agency priority to transfer information kept in paper files for cases that predated FACES into the system. Additionally, FACES reports show that data were not available on

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<sup>11</sup>U.S. General Accounting Office, *District of Columbia Child Welfare: Long-Term Challenges to Ensuring Children's Well-Being*, GAO-01-191 (Washington, D.C.: Dec. 29, 2000).

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many of the cases that entered the foster care system after FACES came on line. For example, complete data on the initiation of investigations and completion of safety assessments were not available for about half of the 943 cases that entered the foster care system after FACES came on line. CFSA officials explained that they intend to focus on improving a few data elements at a time for current and future events.

Having systems that provide complete and accurate data is an important aspect of effective child welfare programs. HHS requires all states and the District of Columbia to have an automated child welfare information system. These systems, known as SACWIS, must be able to record data related to key child welfare functions, such as intake management, case management, and resource management. However, in its review of FACES, HHS found CFSA's system was not in full compliance with several requirements, including the need to prepare and document service/case plans and to conduct and record the results of case reviews.<sup>12</sup>

In addition to the standards and requirements established by HHS for all child welfare systems, the modified final order requirements established by the U.S. District Court for the District of Columbia direct CFSA to produce management data and many reports on their operations. For example, the modified final order requires that CFSA be able to produce a variety of data such as, the number of children (1) for whom a case plan was not developed within 30 days, (2) with a permanency goal of returning home for 12 months or more, and (3) placed in a foster home or facility who have been visited at specified intervals.

Complete, accurate, and timely case management data enables caseworkers to quickly learn about new cases, supervisors to know the extent that caseworkers are completing their tasks, and managers to know whether any aspects of the agency's operations are in need of improvement. Child welfare automated systems need to have complete case data to help ensure effective management of child welfare programs. A child welfare expert said that there is a great need to transfer information from old case records to new automated systems. For example, the expert said that records of older teens have been lost, and, with them, valuable information such as the identity of the child's father.

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<sup>12</sup>HHS completed its SACWIS assessment review of FACES in June 2000. The purpose of this review is to assess whether the child welfare information system performs functions that are important to meeting the minimal requirements.

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Without data in FACES, CFSA's caseworkers will have to look for paper records in the case files, some of which are voluminous. This file review effort is much more time-consuming than reviewing an automated report and as a result, when cases are transferred to new caseworkers, it requires more time for them to become familiar with cases.

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## CFSA Has Enhanced Its Working Relationship with the D.C. Family Court by Working Collaboratively, but Hindrances Remain

CFSA has enhanced its working relationship with the D.C. Family Court by working more collaboratively, but several factors have hindered these relationships. By participating in committees and training sessions, collocating OCC attorneys with caseworkers, and communicating frequently, CFSA has enhanced its working relationship with the Family Court. CFSA participates in various planning committees with the Family Court, such as the Implementation Planning Committee, a committee to help implement the District of Columbia Family Court Act of 2001. CFSA caseworkers have participated in training sessions that include OCC attorneys and Family Court judges. These sessions provide all parties with information about case management responsibilities and various court proceedings, with the intent of improving and enhancing the mutual understanding about key issues. Additionally, CFSA assigned two caseworkers who assist in arranging court-ordered services for children and their families at the Family Court. Also, since 2002, OCC attorneys have been located at CFSA and work closely with caseworkers. This arrangement has improved the working relationship between CFSA and the Family Court because the caseworkers and the attorneys are better prepared for court appearances. Furthermore, senior managers at CFSA and the Family Court communicated frequently about day-to-day operations as well as long-range plans involving foster care case management and related court priorities, and on several occasions expressed their commitment to improving working relationships.

However, CFSA officials and Family Court judges also noted several hindrances that constrain their working relationship. These hindrances include the need for caseworkers to balance court appearances with other case management duties, an insufficient number of caseworkers, caseworkers who are unfamiliar with cases that have been transferred to them, and differing opinions about the responsibilities of CFSA caseworkers and judges. For example, although CFSA caseworkers are responsible for identifying and arranging services needed for children and their families, some Family Court judges overruled service recommendations made by caseworkers. Family Court judges told us that they sometimes made decisions about services for children because caseworkers did not always recommend appropriate ones or provide the

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court with timely and complete information on the facts and circumstances of the case. Caseworkers and judges agreed that appropriate and timely decisions about services for children and their families are important ones that can affect a child's length of stay in foster care.

CFSA officials and Family Court judges have been working together to address some of the hindrances that constrain their working relationship. CFSA managers said that scheduling of court hearings has improved. According to agency officials, in March 2003, CFSA began receiving daily schedules from the Family Court with upcoming hearing dates. This information allows caseworkers to plan their case management duties such that they do not conflict with court appearances. Also, as of March 2003, Family Court orders were scanned into FACES to help ensure that caseworkers and others involved with a case have more complete and accurate information. To help resolve conflicts about ordering services, CFSA caseworkers and Family Court judges have participated in sessions during which they share information about their respective concerns, priorities, and responsibilities in meeting the needs of the District's foster care children and their families.

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## Conclusions

CFSA has taken steps to implement several ASFA requirements, met several performance criteria, developed essential policies, and enhanced its working relationship with the Family Court. In addition, CFSA has implemented new group home policies, improved the average time caseworkers took to implement certain policies and undertaken initiatives, in conjunction with the Family Court, to improve the scheduling of court hearings. However, CFSA needs to make further improvements in order to ensure the protection and proper and timely placement of all of the District's foster care children. By implementing all ASFA requirements, meeting the performance criteria and effectively implementing all policies, CFSA will improve a child's stay in the foster care system and reduce the time required to attain permanent living arrangements. Furthermore, complete, accurate, and timely case management data will enable caseworkers to quickly learn about new cases and the needs of children and their families, supervisors to know the extent to which caseworkers are completing all required tasks in the most timely way, and managers to know whether any critical aspects of the agency's operations are in need of improvement. Without automated information on all cases, caseworkers do not have a readily available summary of the child's history, which may be critical to know when making plans about the child's safety, care, and well-being.

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Mr. Chairman, this concludes my prepared statement. I will be happy to respond to any questions that you or other Subcommittee members may have.

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## GAO Contact and Acknowledgments

For further contacts regarding this testimony, please call Cornelia M. Ashby at 202-512-8403. Individuals making key contributions to this testimony included Carolyn M. Taylor, Mark E. Ward, Sheila Nicholson, Vernetta Shaw, Joel Grossman, and James Rebbe.

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*Foster Care: Recent Legislation Helps States Focus on Finding Permanent Homes for Children, but Long-Standing Barriers Remain.* [GAO-02-585](#). Washington, D.C.: June 28, 2002.

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*D.C. Family Court: Progress Made Toward Planned Transition, but Some Challenges Remain.* [GAO-02-660T](#). Washington, D.C.: April 24, 2002.

*District of Columbia Child Welfare: Long-Term Challenges to Ensuring Children's Well-Being.* [GAO-01-191](#). Washington, D.C.: December 29, 2000.

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